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US DISTRICT &  
BANKRUPTCY COURTS  
JUN 28 P 5:08  
CLERK'S OFFICE

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF IDAHO**

In the matter of:	)	
	)	Case No. 98-40540-13
MICHAEL JAY PEASE and	)	
CHARLOTTE ANN PEASE,	)	<b>MOTION TO ALLOW DEBTORS</b>
	)	<b>TO PURCHASE REAL PROPERTY,</b>
Debtors.	)	<b>AND NOTICE OF HEARING</b>
	)	
	)	
	)	
	)	

**COMES NOW**, the above-named debtors by and through their attorney of record, Douglas K. Dykman, and moves the Court for an Order allowing the Debtors to purchase real property through Simplots at 3246 Joanna Court, American Falls, Idaho 83211 pursuant to 11 U.S.C. Section 1329 (a).

**THIS MOTION** is based upon the following representations of the Debtors and the undersigned counsel:

1. The debtors filed a Chapter 13 bankruptcy on May 28, 1998 and that the Chapter 13 plan for 60 months was confirmed on November 16th 1998.

2. The Debtors request an Order to purchase real property located at the above stated address. The property payment on the real property is estimated at \$550.00 which includes taxes and insurance. The Debtors currently are renting for approximately the same payment as the mobile home they wish to purchase.

3. The Debtors have sought out and secured refinancing through

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Simplots who have agreed to finance their loan to allow the purchase of the real property.

4. That by allowing Simplots to finance the purchase of real property debtors home will not adversely affect the creditors nor the remaining Chapter 13 plan payments.

5. That the debtors and other creditors shall not be adversely affected by allowing the Debtors to purchase the mobile home.

For the above stated reasons, debtors respectfully request the Court to grant their motion to purchase real property.

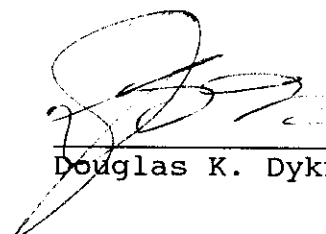
DATED this 28th day of August, 2000.

  
\_\_\_\_\_  
Douglas K. Dykman

**NOTICE OF HEARING**

PLEASE TAKE NOTICE that the undersigned will call up his MOTION TO ALLOW DEBTORS TO PURCHASE REAL PROPERTY, AND NOTICE OF HEARING in the above-entitled Court on the 19th day of September, 2000, at the hour of 1:30 a.m. at the US Bankruptcy Courtroom, 801 East Sherman, Federal Building, Pocatello, ID 83201.

DATED this 28th day of August, 2000.

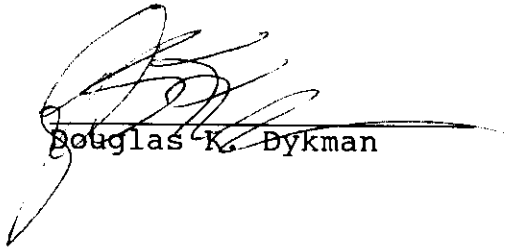
  
\_\_\_\_\_  
Douglas K. Dykman

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 28th day of August, 2000, I mailed a true and correct copy of the foregoing MOTION TO ALLOW DEBTORS TO PURCHASE REAL PROPERTY AND NOTICE OF HEARING to all creditors on the mailing matrix and the following by placing the same in the U.S. mail, postage prepaid thereon:

L.D. Fitzgerald, Trustee  
P.O. Box 4886  
Pocatello, ID 83205

U.S. Trustee  
P.O. Box 110  
Boise, ID 83701



Douglas K. Dykman